

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0020486** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. THE APPLICANT IS:** Town of Lake Providence
South Pond
201 Sparrow Street
Lake Providence, LA 71254

- II. PREPARED BY:** Darlene Bernard

DATE PREPARED: February 26, 2008

- III. PERMIT ACTION:** Reissue LPDES permit LA0020486, A119449
LPDES application received: March 2, 2006

LPDES permit effective: August 1, 2001
LPDES permit expired: July 31, 2006
EPA has not retained enforcement authority

IV. FACILITY INFORMATION:

- A. The application is for the discharge of treated sanitary wastewater from an existing publicly owned treatment works serving the Town of Lake Providence, the East Carroll Parish Detention Center and the Riverbend Detention Center.

- B. The permit application does not indicate the receipt of industrial wastewater.

- C. The facility is located approximately 0.5 miles west of the intersection of Gould Boulevard and Mill Street, in Lake Providence, East Carroll Parish.

- D. The treatment facility consists of a three cell oxidation pond. Disinfection is by chlorination.

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E. Outfall 001

Discharge Location: Latitude 32°47'50" North
 Longitude 91°11'21" West

Description: treated sanitary wastewater

Design Capacity: 0.85 MGD

Type of Flow Measurement which the facility is currently using:

Continuous recorder

V. RECEIVING WATERS:

The discharge is into the Mississippi River in segment 070101 of the Mississippi River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 070101 of the Mississippi River Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment 070101	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Full	Full	Full	Full	N/A	N/A	N/A	N/A

^{1/}The designated uses and degree of support for Segment 070101 of the Mississippi River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Volume 5, Part B, Water Quality Inventory respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 070101 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWLS) as habitat for the Fat pocketbook and the Pallid sturgeon, which is listed federally as a threatened species. This strategy was

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submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). A copy of the draft permit has been submitted to the FWS for review.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the fact sheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

The public notice is published in a local paper of general circulation and the Office of Environmental Services Public Notice Mailing List.

For additional information contact:

Darlene Bernard
Permits Division
Department of Environmental Quality
Office of Environmental Services
PO Box 4313
Baton Rouge, LA 70821-4313

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IX. PROPOSED PERMIT LIMITS:

Final Effluent Limits:

OUTFALL 001

Final effluent limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD ₅	213	30 mg/l	45 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size discharging to the Mississippi River.
TSS	638	90 mg/l	135 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size discharging to the Mississippi River.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.a, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgment in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

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2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No LA0020486:	Issued:	July 21, 2001
	Effective:	August 1, 2001
	Expired:	July 31, 2006

During the period beginning the effective date of the permit and lasting through the expiration date of the permit (Design 0.85 MGD)

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Monthly Avg.	Weekly Avg.	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
BOD ₅	30 mg/l	45 mg/l	1/week	3-Hour Composite
TSS	90 mg/l	135 mg/l	1/week	3-Hour Composite
Fecal Coliform	200	400	1/week	Grab
pH	6-9 Standard Units		1/week	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of EDMS indicates the following inspections were performed for this facility:

Date – March 13, 2006
Findings and/or Violations:

An inspection was conducted as a result of an incident report in which sewage was released when a pump tripped. At the time of the inspection there was no sewage in the canals below the facility.

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Date – February 16, 2006

Findings and/or violations:

An inspection was conducted as a result of an incident report in which an oxidation pond overflowed when there was a lot of rain and the pumps shorted out. The breach was filled and the sewer overflow was stopped.

Date – September 16, 2005

Findings and/or Violations:

A routine compliance evaluation inspection revealed the area around the oxidation ponds fenced and mowed. No odors were noted. Records and reports were made available. A DMR review revealed pH exceedances for June, October, and December, 2004. It was apparent an unauthorized discharge had occurred from the first cell at the emergency valve into the canal which separates the first and second cells during the past week. Permittee must obtain permission to discharge into the canal since it is not the permitted receiving stream and treatment from the second and third cells and chlorination at the outfall are bypassed.

B) Compliance and/or Administrative Orders

A review of EDMS revealed that there was a Notice of Deficiency issued as follows:

LDEQ Issuance: NOD

Issued – October 31, 2005

Findings:

The permittee was issued a Notice of Deficiency on October 31, 2005 after an inspection revealed that pH values exceed permit limits on three occasions in 2004

C) DMR Review

A review of the discharge monitoring reports for the period beginning January 1, 2004 through June 3, 2004 and October 1, 2004 through December 31, 2005 revealed the following violations:

<u>Effluent Characteristic</u>	<u>Number of Violations</u>
BOD ₅ - (concentration)	2
BOD ₅ - (mass)	0
TSS - (concentration)	0
TSS - (mass)	0
Fecal Coliform	0
pH	3

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NOTE: There were no DMR's in EDMS for 2006, or 2007.

XII. ADDITIONAL INFORMATION:

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.85 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ gal/lb} \times 0.85 \text{ MGD} \times 30 \text{ mg/l} = 213 \text{ lb/day}$$

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows between 0.5 and 1.0 MGD.

<u>Effluent Characteristics</u>	<u>Monitoring Requirements</u>	
	<u>Measurement</u>	<u>Sample</u>
	<u>Frequency</u>	<u>Type</u>
Flow	Continuous	Recorder
BOD ₅	1/week	3-hr. composite
Total Suspended Solids	1/week	3-hr. composite
Fecal Coliform Bacteria	1/week	Grab
pH	1/week	Grab

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. Please make additional copies to be utilized for each year of this permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

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XIII. TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV. REFERENCES:

Louisiana Water Quality Management Plan, Vol. 10, "Wasteload Allocations and Discharger Inventory", Louisiana Department of Environmental Quality, 1992.

Louisiana Water Quality Management Plan, Vol. 5-B, "Water Quality Inventory", Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards", Louisiana Department of Environmental Quality, 1999.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 23 - "The LPDES Program", Louisiana Department of Environmental Quality, 1999.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Town of Lake Providence, South Pond, March 2, 2006.